

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TERRY CLOTZ, on behalf of himself and others  
similarly situated,

Plaintiff,

vs.

THE FEDERAL SAVINGS BANK, RASANI  
MEDIA and SUREFIRE MARKETING LLC,

Defendants.

Case No. 1:22-cv-03755

Honorable Jeremy C. Daniel

**STATUS REPORT**

Pursuant to this Court's order of February, 21, 2024, Plaintiff and Defendant have met and conferred regarding future deadlines for this case. Discovery in this case was previously limited to the issue of Plaintiff's consent to receive the telephone calls at issue. As it stands, discovery is now open for all purposes. After the close of discovery, Plaintiff anticipates filing a motion for class certification. Defendants also anticipate filing motions for summary judgment.

Accordingly, the parties propose the following deadlines:

Deadline for Close of Discovery	September 9, 2024
Initial Expert Disclosure Deadlines	October 11, 2024
Rebuttal Expert Disclosure Deadline	November 29, 2024
Deadline for Close of Expert Discovery	January 10, 2025
Deadline to Object to Expert Reports	February 28, 2025
Deadline for Motion for Class Certification	February 28, 2025
Defendants' Motions for Summary Judgment	Deadlines to be set after ruling on the Motion for Class Certification

Rule 16 Conference	Following a Decision by the Court on the Motion for Class Certification
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Respectfully Submitted,

/s/ Andrew Roman Perrong

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